

AO 91 (Rev. 11/11) Criminal Complaint

Filed 2-15-17  
 Clerk, U. S. District Court  
 Western District of Texas  
 By [Signature]  
 Deputy

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

Piper Lee

Case No. SA17MS165

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 11, 2017 in the county of Comal in the  
Western District of Texas, the defendant(s) violated:

## Code Section

18 U.S.C. 111(a)(1) & (b) and  
 18 U.S.C 2

## Offense Description

Assaulting, resisting or impeding certain officers or employees using a deadly  
 weapon and Aiding & Abetting.

PENALTIES: Up to 20 years imprisonment, \$250,000 fine, 3 years  
 supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

[Signature]  
 Complainant's signature

William B. Witt, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date:

2/15/2017

[Signature]  
 Judge's signature

City and state:

San Antonio, TX

HENRY J. BEMPORAD, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, William B. Witt, being duly sworn, state the following:

01. I have been employed as a criminal investigator with the United States Postal Inspection Service (USPIS) for the past twenty-one (21) years. In the course of my employment, I have led, conducted and/or participated in hundreds of investigations involving offenses relating to the United States Postal Service (USPS), to include: mail theft, identity theft, burglary, robbery, homicide, narcotics trafficking; firearms trafficking; import and export violations; money laundering; child exploitation; and financial fraud. I have extensive training and experience investigating these offenses; particularly when communication facilities such as the United States Mails and private delivery couriers (United Parcel Service (UPS), Federal Express (FedEx), etc.) are employed to facilitate the criminal activity. I have received training by the USPIS, Federal Bureau of Investigation (FBI), Internal Revenue Service (IRS), Department of Homeland Security (DHS), and numerous other federal and state law enforcement agencies in the investigation of criminal organizations engaged in all manner of criminal enterprise.

02. In the course of the past twenty-one (21) years, I have conducted hundreds of financial investigations relating to various criminal enterprises. I have received training from the USPIS, DEA, IRS, and Department of Justice (DOJ) in the investigation of individuals and organizations involved in the movement and laundering of illicit criminal proceeds. Further, my undergraduate studies included a degree in Accounting and certifications as a Certified Public Accountant (CPA), Certified Internal Auditor (CIA), and Certified Managerial Accountant (CMA). My experience has also included training in the areas of forensic accounting and financial auditing. During the past twenty-one (21) years, I have participated in hundreds of financial investigations which involved money laundering and currency reporting violations, specifically as they relate to the tactics employed by organizations engaged in various unlawful activities such as drug trafficking,

firearms trafficking, racketeering, prostitution, human trafficking, underground banking, financial fraud, and tax evasion.

03. This affidavit is in support of a Criminal Complaint charging the following individual

Piper Lee,

With the following offense

Assault on a Federal Officer and Aiding & Abetting, in violation of Title 18 United States Code, Section 111 and 2;

04. I have probable cause to believe, and do believe, that the above referenced individuals committed the referenced federal offenses.

#### **PROBABLE CAUSE**

On February 10, 2017, the resident of a home in Spring Branch, Texas contacted local law enforcement to report the theft of his mail. The resident provided your Affiant with a video segment which showed a white male subject, driving a maroon/brown colored Toyota Venza, as he broke the lock on the mail receptacle and removed the U. S. Mail. Your Affiant has viewed this video numerous times during the course of this investigation.

On February 11, 2017, Your Affiant responded to the community mailbox located in the same Spring Branch neighborhood for a report of a robbery and shooting of a U. S. Postal Service employee. U.S. Postal Service Rural Carrier, M.S., was engaged in the performance of her duties delivering mail to the community mailbox when a masked man approached her with a gun drawn and demanded her cellular phone. M.S. took some steps back and the man demanded again saying, "Give me your fucking phone." M.S. was unable to detach her phone which was clipped to her shirt. The man took aim and shot her striking her in the legs. The man entered M.S.'s vehicle which contained mail bearing United States postage and being handled by the United States Postal Service. The man drove away at a high rate of speed. According to M.S., immediately prior to the robbery, she observed a maroon/brown colored Toyota Venza parked adjacent to the street near the community mail receptacles. Witnesses observed the Toyota Venza leave the scene following the mail carrier's vehicle, both traveling at a high rate of speed.

Postal inspectors responded to scene of the shooting along with local law enforcement. M.S.'s vehicle was found abandoned in a heavily wooded area approximately 3 miles from where the shooting occurred. M.S.'s purse, wallet and personal effects were stolen along with a significant quantity of the U.S. mail which had been in the vehicle when it was stolen. The bullet entered M.S.'s leg went straight through and entered her other leg lodging in her bone. M.S. is a federal officer as defined by Title 18 U.S.C. §1114 and the vehicle she was driving is a Chevy pickup which was manufactured in Silao, MX, having travelled in foreign and interstate commerce.

Postal Inspectors determined the robbery involved at least two (2) subjects, as one drove a follow vehicle and the other conducted the robbery. The suspect who conducted the robbery was described by the victim and other witnesses as a white male, approximately 20 to 25 years of age. Various stages of the robbery were captured by surrounding video cameras. Postal Inspectors recovered the video footage. Your Affiant has viewed the various video images and determined the vehicle driven by the suspects before and after the shooting on February 11, 2017 appears to be the same maroon/brown Toyota Venza shown on video from February 10, 2017.

On February 13, 2017, Postal Inspectors observed a brown/maroon Toyota Venza that matched the description of the Venza seen on February 10 and 11, 2017. The Venza was seen at a McDonald's within one-half mile of the location of the initial robbery, as well as the shooting of the postal employee. A Postal Inspector observed that the vehicle was occupied by a male and female subject. The Inspector observed the suspects switch positions, with the male assuming the driver's position. The Inspector noted the male subject's appearance was consistent with the description developed from the events of February 10 and 11, 2017. The Inspector activated his emergency equipment and attempted to initiate an investigative stop of the Toyota Venza. The male subject subsequently fired multiple shots from a handgun at the pursuing agents, which included marked law enforcement units. The suspects evaded capture. The license plate on the Toyota Venza, GMB0394, had been reported stolen on February 9, 2017.

On February 14, 2017, Postal Inspectors were contacted by employees of a hotel located near Highway 281, San Antonio, Texas. According to employees, during the course of business, specifically, maintaining the cleanliness of guest rooms, they observed a large amount of U. S. Mail and a handgun case within the room. Employees believed the items to be suspicious based on the volume and condition of the mail observed.

On February 14, 2017, your Affiant responded to the location. Your Affiant determined the subjects had placed a large trash bag outside their room, which was collected by hotel staff in the normal course of their duties. Your Affiant examined the trash bag. Your Affiant observed a large quantity of U. S. Mail, open and rifled, bearing the names and addresses of more than one hundred different addressees. Your Affiant noted the mail, originating from locations throughout the United States was addressed to locations throughout San Antonio and the surrounding area. Your Affiant also noted a substantial portion of the mail was destined for addresses in the Spring Branch, Texas area. Your Affiant also noted that one or more of the pieces of mail were destined for delivery within the routes associated with the events which occurred on February 10, 2017,

and February 11, 2017, detailed above. Your Affiant noted the postmark dates on the mail were indicative of mail processed for delivery on or about February 10, 2017, and February 11, 2017. Your Affiant noted the mail contained many pieces of personal identifying information, specifically a large number of W-2 tax forms.

Your Affiant determined that the occupants of the hotel room had been rented on February 4, 2017. Your Affiant reviewed the security video maintained by the hotel. Your Affiant observed that the video clearly captured images of the male and female suspects as they checked into the hotel. Your Affiant noted the appearance of the male suspect was consistent with the suspect captured on the video recordings associated with the criminal offenses on February 10, 2017, and February 11, 2017, as well as that of the description provided by the Postal Inspector involved in the February 13, 2017 chase and shooting. Additionally, video footage from the hotel parking lot contains images of the suspects, one male and one female, as they exit a maroon/brown Toyota Venza. Based on my review of the previous videos, I believe the vehicle is the same one observed on the videos recovered during the offenses on February 10, 2017 and February 11, 2017.

On that same date, your Affiant learned that hotel employees had observed the male and female subjects associated with the room in question were operating at least three (3) different vehicles. Your Affiant determined that most recently, in addition to the maroon/brown Toyota Venza, the employees observed the subjects utilizing a yellow yellow Volkswagen bearing Texas license 'DOPEST'.

On that same date, your Affiant learned that local law enforcement officers located a Toyota Venza, bearing license plate, GMB0394, matching the vehicle used in the offenses of February 10, 2017, and February 11, 2017, as well as the chase on February 13, 2017. The abandoned vehicle was recovered approximately three (3) blocks from the hotel. The abandoned vehicle was towed to the U.S. Postal Service Impound lot. A federal search warrant was obtained and the vehicle was searched. Among the items recovered were two paper Texas temporary driver's licenses in the name of "Jessica Claire," bearing a photograph resembling Sara Richford, a spent shell casing, and a receipt dated February 13, 2017, at 9:17 a.m., from the Spring Branch McDonald's from which the vehicle fled the day before. This date and time are consistent with the date and time when the Postal Inspector observed the Toyota Venza at the McDonald's immediately prior to the chase and shooting on Highway 281, San Antonio, Texas.

Also on February 14, 2017, your Affiant and members of the San Antonio Police Department established covert surveillance in order to observe the identified hotel room. Agents observed a yellow Volkswagen bearing Texas vehicle license 'DOPEST' arrive, the male suspect and the female suspect exit the Volkswagen and entered room 110, leaving a male driver in the Volkswagen. Within minutes, the male and female subjects exited the hotel room carrying a substantial amount of boxes and/or bags. Agents observed the suspects enter the yellow Volkswagen and depart the hotel. Shortly after leaving the hotel lot, a marked San Antonio Police Department unit, at the request of U.S. Postal Inspectors, attempted to conduct a stop of the vehicle. However, the vehicle failed to yield to officers and in fact, at least one of the male subjects fired one or more shots from a handgun at responding officers. The vehicle was found

abandoned a short while later at North Star Mall, San Antonio, Texas. The vehicle was secured by law enforcement. Subsequently, a federal search warrant was executed on the Volkswagen, wherein a credit card of the postal employee who was shot on February 11, 2017 was found. Also found was an envelope addressed to Sara Richford and a medical lab receipt in the name of Sara Richford.

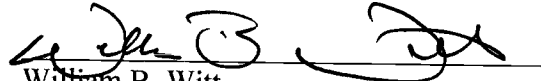
The room at the hotel near Highway 281 was secured and on February 14, 2017 a search warrant was obtained and room 110 was searched. Among the items found within that room were notes showing the casing of a postal route, a round of ammunition, and an employee ID for Bradley A'Hearn. The ammunition round was a 9mm which is the same caliber found at the shooting of the victim on February 11, 2017, and during the shooting with police on February 13, 2017.

On February 15, 2017 a confidential source (CS) contacted law enforcement and advised that the CS had been contacted by Sara Richford on February 14, 2017 asking to be picked up. When the CS arrived, Richford was accompanied by two males. One male went by the name Brad and had a firearm. While in the car they discussed being in a yellow Volkswagen while in a chase, a shooting at Jim's, being at North Star Mall and driving the wrong way down a road while police chased them. Richford and her companions each participated in providing different parts of the conversation. The CS took Richford and the two men to a hotel located in downtown San Antonio, Texas. At the request of Richford and her companions, the CS registered for them and left the hotel.

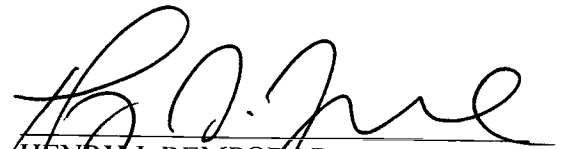
After leaving Richford and her companions at the downtown hotel, later on February 15, 2017, the CS received multiple calls from the male called Brad asking to be picked up from the downtown hotel. A postal inspector was with the CS and observed the incoming calls which were coming from the hotel. At approximately 9:00am on February 15, 2017 SAPD arrested Sara Richford, Bradley A'Hearn, and Piper Lee in the parking lot of the downtown hotel after they were seen leaving their room.

On February 15, 2017, following her statutory and constitutional warnings, Sara Richford, voluntarily stated that on Saturday, February 11, 2017, she observed Bradley A'Hearn approach the U.S. mail carrier at the community mail boxes located at 499 River Way, Spring Branch, Texas, with the intent to steal mail. Richard stated, A'Hearn put on a mask, exited the Toyota Venza, approached the U.S. mail carrier, she heard a gunshot, observed the postal carrier on the ground, saw A'Hearn steal the carrier's vehicle, and followed him in the Toyota Venza. Once the carrier's vehicle was abandoned, A'Hearn told Richford he "shot the bitch because she wouldn't give me her phone. She was going to call 911." Richford also stated she was present in the Toyota Venza on Monday, February 13, 2017, as A'Hearn fired multiple shots at federal agents and local law enforcement during a high speed chase on Highway 281 in San Antonio, Texas. Richford further stated Piper Lee, driving a yellow Volkswagen, provided them transportation on February 13, 2017 and February 14, 2017. According to Richford, Lee drove her and A'Hearn to the hotel near Hwy 281 on February 14, 2017, waited for them as they removed boxes and bags ~~containing personal items and stolen mail~~ from the room they had occupied, and then drove at a high rate of speed to evade law enforcement. Richford further - WBN

stated, Lee continued to drive in a dangerous and evasive manner as A'Hearn fired at federal officers and local law enforcement officers assisting federal officers. Lee, A'Hearn and Richford abandoned the yellow Volkswagen at North Star Mall, evading the law enforcement officers attempting to apprehend them. According to Richford, she contacted a friend to pick them up. Richford's friend secured a room for the three at a hotel in downtown San Antonio, Texas, where they were apprehended on February 15, 2017.

  
William B. Witt  
U. S. Postal Inspector

Subscribed and sworn to before me in San Antonio, Texas, on this 15<sup>th</sup> day of February, 2017.

  
HENRY J. BEMPORAD  
UNITED STATES MAGISTRATE JUDGE